

05-CV-00388-VRDCT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ST. PAUL FIRE AND MARINE
INSURANCE COMPANY, a Minnesota
corporation and ST. PAUL GUARDIAN
INSURANCE COMPANY, a Minnesota
corporation,

Plaintiffs,

v.

HEBERT CONSTRUCTION, INC., a
Washington corporation; MEADOW
VALLEY, LLC, a Washington limited
liability company; ROGER and SHELLY
HEBERT, individually and the marital
community thereof; HENRY and KAREN
HEBERT, individually and the marital
community thereof; ANDRZEJ and ROMA
LAWSKI, individually and the marital
community thereof; JAMES and ANNE
KOSSERT, individually and the marital
community thereof;

Defendants.

No. C05-388Z

SPECIAL VERDICT

We, the jury, answer the questions submitted by the Court as follows:

QUESTION 1: Do you find for the Meadow Valley Defendants on their first claim
alleging that St. Paul failed to act in good faith?

ANSWER: NO (Write "yes" or "no")

1 (INSTRUCTION: If you answered "yes" to Question 1, please answer Question 2. If
2 you answered "no," proceed to Question 3).

3 QUESTION 2: What is the amount of damage to the Meadow Valley Defendants
4 proximately caused by St. Paul's bad faith?

5 ANSWER: \$ _____

6 QUESTION 3: Do you find for the Meadow Valley Defendants on their second claim
7 alleging that St. Paul engaged in an unfair or deceptive act or practice in violation of the
8 Consumer Protection Act?

9 ANSWER: NO (Write "yes" or "no")

10 (INSTRUCTION: If you answered "yes" to Question 3, please answer Question 4. If
11 you answered "no," proceed to Question 5.)

12 QUESTION 4: What is the amount of damages to the Meadow Valley Defendants
13 proximately caused by St. Paul's unfair or deceptive act or practice?

14 ANSWER \$ _____

15 QUESTION 5: What is the amount of "property damage" you find happened to
16 buildings 7, 8, 15 and 16 during the Guardian policy period?

17 ANSWER: \$ 322,032.45

18 QUESTION 6: What amount of "property damage" do you find happened at the
19 Meadow Valley Condominiums between April 15, 2000 and April 15, 2003 during the St.
20 Paul Fire Policy?

21 ANSWER: \$ 1,869,198.30

22
23 DATE: 9/28/06

Stephanie Uhrich
PRESIDING JUROR